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Attorneys for Defendant
ADECCO USA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KAITLYN SHEPARDSON, individually,
and on behalf of other members of the
general public similarly situated,

Case No.: 3:15-cv-05102 (EMC)

Assigned For All Purposes To:
Hon. Edward M. Chen

**JOINT STIPULATION AND [PROPOSED]
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE**

ADECCO USA, INC., and DOES 1 through 100, inclusive.

[Pursuant to Local Rules 7-12, 16.2(e)]

Date: February 13, 2020
Time: 9:30 a.m.
Location: Courtroom 05, 17th Floor
450 Golden Gate Avenue
San Francisco, California 94102

Defendants

Original Complaint filed: August 18, 2015
Trial Date: None set

1 Plaintiff Kaitlyn Shepardson (“Plaintiff”) and Defendant Adecco USA, Inc. (“Adecco” or
2 “Defendant”) (collectively, the “Parties”), through their respective counsel of record, stipulate and
3 agree as follows:

4 WHEREAS, Plaintiff filed the proposed class action on August 18, 2015. Defendant
5 removed the action to this Court and filed a Motion to Compel arbitration pursuant to the Dispute
6 Resolution Agreement between the Parties. The Court granted Defendant’s Motion to Compel
7 pursuant to the arbitration agreement. (ECF Doc. 22.)

8 WHEREAS, Plaintiff’s individual claims are presently pending before the American
9 Arbitration Association (“AAA”), Case No. 01-19-0000-4026.

10 WHEREAS, Plaintiff’s claims under the Private Attorneys’ General Act (“PAGA”) is
11 stayed pending the arbitration of Plaintiff’s individual wage claims.

12 WHEREAS, the Court scheduled the next case management conference in this matter for
13 February 13, 2020 (ECF Doc. 58).

14 WHEREAS, the arbitration of Plaintiff’s individual claims is scheduled for May 11 and 12,
15 2020.

16 **IT IS THEREFORE STIPULATED BY THE PARTIES, THROUGH THEIR
17 RESPECTIVE COUNSEL OF RECORD** that, subject to the Court’s approval, the case
18 management conference be continued to a date after May 20, 2020.

19 IT IS SO AGREED:

20 DATED: January 21, 2020

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21

22 By: /s/ John Glugoski
23 Matthew Righetti
24 John Glugoski
Michael Righetti
25 Attorneys for Plaintiff

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1
2 DATED: January 21, 2020
3

JACKSON LEWIS P.C.

4 By: /s/ Angel R. Sevilla
5 Angel R. Sevilla
6 Attorneys for Defendant
7 ADECCO USA, INC.
8

9
10 *Counsel for Plaintiff, John Glugoski authorized
11 submission of his e-signature on this document in
12 writing, by e-mail dated January 21, 2020 at 11:06
13 a.m.

14 **[PROPOSED] ORDER**
15

16 Pursuant to Good Cause, the Court hereby Orders that the Case Management Conference,
17 now scheduled for February 13, 2020, is continued and shall be scheduled to take place on
18 _____, 20__ at _____ a.m./p.m. The Case Management Statement is due
19 by _____, 20__.

20
21 **IT IS SO ORDERED.**
22

23 Dated: _____, 2020
24

25 _____
26 The Honorable Edward M. Chen
27 United States District Court,
28 Northern District of California

4813-6421-8034, v. 1